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VIA E-FILE ONLY

Hon. Robert B. Kugler, D.N.J.
District Court for the District of New Jersey
Camden Vicinage

Re: **Defendants' Opposition to Plaintiff's Joint Motion for the Award of Attorneys' Fees**

Docket No: **1:23-cv-03126-RBK-AMD**
1:23-cv-02967-RBK-AMD

Case Caption: **DF Ventures v. Al Baker, et. al.**
Rastelli Foods Inc. v. Al Baker et. al.

Our Client: **Defendants**

Dear Judge Kugler:

This office represents the Defendants in the above-referenced action. We write to request that the Court vacate its order granting the Plaintiffs' joint application for counsel fees which was returnable on September 5, 2023 and which was entered this afternoon. We made this request because the Defendants have opposed the motion as set forth herein.

The Defendants have prepared an opposition to the motion which is annexed to this letter and were prepared to file their opposition with the Court immediately at the time of the Court's entry of an Order granting the motions. Defendants respectfully request that the Court, in the interests of justice, consider their opposition which again is annexed hereto.

This motion was not returnable for two weeks from today. Defendant Al Baker has been dealing with severe health issues relating to a pulmonary embolism and blood clots. There have been delays in communications with counsel including the approval of this submission which relate to Al's health issues.

We have requested that Plaintiffs' consent to this request but at this time we have not heard back in reply. We appreciate the Court's consideration of this informal request.

Respectfully Submitted,

/s/ Alexander Schachtel

Alexander Schachtel, Esq.

cc: Counsel for Plaintiffs (via email)